The EM SSAB has noted with considerable interest and support that the Waste Isolation Pilot Plant (WIPP) has been remarkably successful in disposing of transuranic waste (TRU) throughout the DOE complex for approximately ten years. The success of the TRU waste program is among DOE's most notable achievements during this time frame.

The EM SSAB is also aware that the mission of the WIPP is being assessed for possible expansion to include disposal of some surplus plutonium from defense programs weapons production activities and certain other nuclear waste such as Greater-Than-Class-C Waste from NRC-related programs.

The success and activity of the WIPP program represents an opportunity for the DOE to make still further progress in addressing some of DOE's legacy waste streams.

The EM SSAB encourages the DOE to evaluate additional storage and disposal options for DOE legacy waste that could result from an expansion of the WIPP disposal mission.

For example, one specific test program that would support this concept involves shipment of a small number of SRS Defense Waste Processing Facility Canisters from SRS to WIPP for storage and evaluation for disposal. Such a test program would permit DOE to evaluate significant issues in DOE's complex-wide high-level waste disposition program such as:

- Shipment container development issues
- Packaging and shipment/receipt issues for both the shipper and the receiver
- Other transportation issues
- Dealing with consent-based approvals

It is the intent of this test program to provide valuable input and to serve as a precursor for the DOE program for the disposal of DOE's high-level waste.

The EM SSAB would like to offer one recommendation that should increase the effectiveness and timeliness of addressing the disposal of DOE high-level waste.

It is recommended that DOE work with other national leaders to separate the disposition programs for the Defense Program high-level waste and the commercial nuclear industry high-level waste.

The DOE high-level waste program is at a more advanced stage relative to disposition than the commercial nuclear power industry waste-disposal program. For example, DOE presently has over 3,000 canisters at SRS awaiting the next step in the disposition process. Further, the waste form characterization and content is well known and understood. The same will be true for the waste forms in canisters that will be produced at Hanford and Idaho.

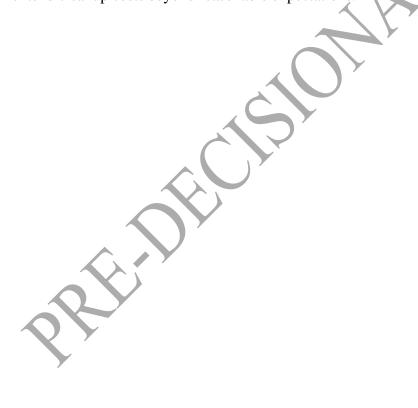
Also, the amount of DOE high-level waste is only 10% of the commercial nuclear volume. It is the intent of this recommendation to afford DOE an opportunity to address a much reduced quantity of high-level waste with well known forms. Disposition of the smaller volume in this manner could serve as an excellent learning tool for addressing the commercial high-level waste-disposition program.



The EM budget is composed of several components, including costs to maintain the EM complex in a safe 'operations ready' state, out-year compliance costs to meet future regulatory milestones, current-year compliance costs to meet regulatory milestones in the current fiscal year and other costs not directly tied to regulatory milestones.

Included in these costs is funding for the development of new technology that will improve the productivity of cleanup projects across the complex. The enhanced solvent for the Salt Waste Processing Facility at SRS is an example of a successful R&D project.

As the current federal budgeting activities continue to constrain EM cleanup activities, the EM SSAB recommends that DOE not constrain funding in areas of technology research and development. The EM SSAB recognizes that without innovative solutions for the future, the cost and timing of cleanup projects could jeopardize compliance with regulatory milestones and extend cleanup costs beyond reasonable expectations.



The EM SSAB recommends that DOE place more emphasis and priority on evaluating technologies that could make recycling excess materials cost effective. Decontaminating these materials for resale can have many positive benefits:

- Saving space in onsite CERCLA disposal cells
- Adding more dollars for cleanup from the sale of excess
- Reducing cumulative environmental insult
- Reducing long-term monitoring and stewardship costs

To facilitate continuous cost-effective recycling, the EM SSAB recommends that DOE identify and establish a national recycling center of excellence, incentivize contractors to recycle and repurpose items, and add a recycling and repurposing element to future Requests for Proposals.

